

Message

From: Gerdes, Jason [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D7113E90C9F048FE83D55C5FE643C7E8-JGERDES]
Sent: 9/17/2019 7:27:00 PM
To: Ferguson, Leslie@Waterboards [Leslie.Ferguson@waterboards.ca.gov]
Subject: RE: Point Reyes National Seashore General Management Plan Draft EIS comments

Hello Leslie,

Sorry, I've been in meetings. No problem, yes, talking tomorrow would be fine. Good luck.

Jason

From: Ferguson, Leslie@Waterboards <Leslie.Ferguson@waterboards.ca.gov>
Sent: Tuesday, September 17, 2019 10:29 AM
To: Gerdes, Jason <Gerdes.Jason@epa.gov>
Subject: RE: Point Reyes National Seashore General Management Plan Draft EIS comments

Gerdes

Would you have time to talk tomorrow morning? I am a bit overwhelmed trying to get my comments written up today – I have done my review and actually have a lot of concerns with the Core area diversification. I am going through the document one more time, but it doesn't look to me like they have addressed water supply or sewage issues for changes in visitor use in core areas, and also not the animal and crop diversification impacts. Their main rationale is that the area is minimal (<1%) and already degraded and will have BMPS. My perspective is that while they are degraded, many of them are situated in a vulnerable area from a water quality perspective and could generate significant pollution. The proposed BMPs will frequently not be sufficient in the more vulnerable areas. We asked them to differentiate these areas based on location and vulnerability, but they did not do this. I assume there actually are some core areas on the ridges that might be able to have increased diversification with little impact, but the sites that I am familiar with down near Olemacreek are vulnerable. In these areas it is not a realistic expectation that the typical BMPS for managing stormwater or confined animal and horse boarding facilities will work

Also, I really couldn't tell if they are proposing to let the animals in the core run free or if they are corralled. Please let me know if you can figure this out!! If they are corralled then they are subject to our CAF program requirements which includes installing waste management facilities. This is only discussed in detail in the EIS for existing dairies, not for new uses. There could be a lot of impacts from needing to install and operate manure handling facilities (especially for pigs!!) Not such a big deal for sheep and goats- but manure is still an issue whether the goats/sheep and chicken are "free range" or corralled. Allowing 10 AU for goats and sheep translates to something like 70 animals (I don't have the numbers pulled out right now). These aren't a large number of animals for the pasture areas, but I think they are for the Core areas.

In some core areas, the sites are very vulnerable due to their location at the base of the watershed where significant volumes of flow run overland and also the creeks flood.

Due to my schedule, I have to get draft draft comments in to our team today which doesn't give me a lot of time today to talk. I have found it challenging to review the document because of the way it is structured and it has taken longer than I expected.

I have blue tooth in my car and could discuss tomorrow while I am driving anytime between 8-9. Would that work for you? I hope your conference was interesting.

Thanks

Leslie

From: Gerdes, Jason <Gerdes.Jason@epa.gov>
Sent: Tuesday, September 17, 2019 7:41 AM
To: Ferguson, Leslie@Waterboards <Leslie.Ferguson@waterboards.ca.gov>
Subject: RE: Point Reyes National Seashore General Management Plan Draft EIS comments

Good morning Leslie,

I attended a work conference last week, so I'm a little late getting back to you regarding your review of the Point Reyes GMP Draft EIS. When you and I talked the week before last, I told you I'd check in with you once you had the chance to give the DEIS a review.

Do you have time today, or sometime early this week, to discuss your thoughts on the DEIS, now that you've had a chance to give it a review?

Jason

From: Ferguson, Leslie@Waterboards <Leslie.Ferguson@waterboards.ca.gov>
Sent: Wednesday, September 04, 2019 3:01 PM
To: Gerdes, Jason <Gerdes.Jason@epa.gov>
Subject: RE: Point Reyes National Seashore General Management Plan Draft EIS comments

Yes- 3:30 is good. Call me on my cell phone Ex. 6 Personal Privacy (PP)
Thanks and look forward to talking
Leslie

From: Gerdes, Jason <Gerdes.Jason@epa.gov>
Sent: Wednesday, September 04, 2019 2:59 PM
To: Ferguson, Leslie@Waterboards <Leslie.Ferguson@waterboards.ca.gov>
Subject: RE: Point Reyes National Seashore General Management Plan Draft EIS comments

Hello Leslie,

Thank you for getting back to me.

I have a meeting tomorrow that usually runs from 1:00 to 3:00.

Would it be possible to have a short call tomorrow, maybe at 3:30, to help provide me with some context, and then I can check back with you next week once you've had a chance to review the DEIS?

Would 3:30 work for you? If so, what number should I use to reach you?

Thank you,
Jason

From: Ferguson, Leslie@Waterboards <Leslie.Ferguson@waterboards.ca.gov>
Sent: Wednesday, September 04, 2019 2:34 PM
To: Gerdes, Jason <Gerdes.Jason@epa.gov>
Subject: RE: Point Reyes National Seashore General Management Plan Draft EIS comments

Jason

I just returned today. I have meetings today but am free tomorrow afternoon after 1:00

Let me know if there is a time that works for you.

Just fyi, I haven't had a chance to read the latest draft EIR. I will be reading it this week and plan to get comments together next week

Leslie

From: Gerdes, Jason <Gerdes.Jason@epa.gov>
Sent: Thursday, August 29, 2019 10:41 AM
To: Ferguson, Leslie@Waterboards <Leslie.Ferguson@waterboards.ca.gov>
Subject: FW: Point Reyes National Seashore General Management Plan Draft EIS comments

Hello Leslie,

I left you a voice message during your vacation, but I thought I would send you an e-mail as well.

I have talked with my colleague Sue in our Water Division, and your Water Board colleagues Jan and Rene, regarding the Point Reyes National Seashore General Management Plan Draft EIS, and they all mentioned that the person I really needed to be speaking with was you 😊 .

I know you will be busy having just come back from vacation, but it would be great if I could talk with you sometime next week.

Would you be available either on Wednesday, the 4th, or Thursday, the 5th?

Thank you,
Jason

Jason Gerdes
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From: Keydel, Susan <Keydel.Susan@epa.gov>
Sent: Tuesday, August 20, 2019 10:30 AM
To: Ferguson, Leslie@Waterboards <Leslie.Ferguson@waterboards.ca.gov>; Leclerc, Rene@Waterboards <Rene.Leclerc@Waterboards.ca.gov>; O'Hara, Janet@Waterboards <janet.ohara@waterboards.ca.gov>
Cc: Gerdes, Jason <Gerdes.Jason@epa.gov>; Louis, Gail <Louis.Gail@epa.gov>
Subject: Point Reyes National Seashore General Management Plan Draft EIS comments

Hello Leslie, Jan and René –

You likely know that the Point Reyes National Seashore General Management Plan Draft EIS (DEIS) was released for public comment and the due date to provide comments on the DEIS is September 23rd.

We had a conversation with you a year ago regarding input for the scoping phase (see emails below).

Jason Gerdes (cc'd here) is the lead EPA reviewer for the DEIS and would appreciate again touching base with you all to discuss input on the DEIS.

Thanks in advance for your helpfulness to Jason; he will likely reach out to you directly.

Best,
Sue

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From: Gerdes, Jason <Gerdes.Jason@epa.gov>
Sent: Tuesday, August 6, 2019 3:10 PM
To: Keydel, Susan <Keydel.Susan@epa.gov>; Louis, Gail <Louis.Gail@epa.gov>
Subject: Request for your possible assistance with the review of the Point Reyes National Seashore General Management Plan Draft EIS

Hello Susan and Gail,

My name is Jason Gerdes. I work in the Environmental Review Branch and I'm the lead reviewer for the Point Reyes National Seashore General Management Plan Draft EIS. The DEIS was just released for public comment and the due date to provide comment on the DEIS is September 23rd.

My colleague, James Munson, was the lead for the scoping letter that the EPA submitted for Point Reyes National Seashore GMP. (The scoping letter was submitted to the National Park Service on November 30, 2018.) I have attached a copy of EPA's scoping letter for your reference.

James told me that you both assisted him and acted as associate reviewers for EPA's scoping comment letter. Are you both still in a position to act as potential associate reviewers for the Point Reyes DEIS? If not, do you know who would be the appropriate person from the Water Division for me to contact?

Thank you,
Jason

Jason Gerdes
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From: Ferguson, Leslie@Waterboards <Leslie.Ferguson@waterboards.ca.gov>
Sent: Wednesday, November 7, 2018 12:46 PM
To: Keydel, Susan <Keydel.Susan@epa.gov>
Subject: Re: NPS Point Reyes GMP Amendment EIS

Jan I am free wed morning the 14th until 12:00- If possible I would like to participate. wont we be sending our own comments?

thanks

Leslie

From: Keydel, Susan <Keydel.Susan@epa.gov>
Sent: Wednesday, November 7, 2018 11:56:21 AM
To: Leclerc, Rene@Waterboards
Cc: O'Hara, Janet@Waterboards; Ferguson, Leslie@Waterboards
Subject: RE: NPS Point Reyes GMP Amendment EIS

Hi Rene -

I need to provide comments to the NEPA Review office by the 19th, to roll into EPA's letter on all NEPA issues.

Could we have a call together maybe:

- Friday (Leslie not available),
- Tuesday 13th after 3:30 pm (NPS Roundtable ends then), or
- Wed 14th (9-10 am or 11 am – 4 pm are open for me)

If one of these windows works for you all (including Laurie Taul), feel free to send an Outlook invitation

I will try to include James M. Munson – the NEPA Program lead for assembling EPA's draft response.

Thanks,
sue

From: Leclerc, Rene@Waterboards <Rene.Leclerc@Waterboards.ca.gov>
Sent: Wednesday, November 7, 2018 9:05 AM
To: Keydel, Susan <Keydel.Susan@epa.gov>
Cc: O'Hara, Janet@Waterboards <Janet.O'Hara@waterboards.ca.gov>
Subject: NPS Point Reyes GMP Amendment EIS

Morning Sue,

I'm the Grazing Waiver Program manager here at RB-2 and would be happy to talk with you about the GMP Amendment EIS as it pertains to the Grazing Waiver I oversee for Tomales Bay. Other people you could reach out to here at RB-2 include Leslie Ferguson who oversees our grants program as well as Laurie Taul who oversees the dairy and confined animal facilities programs. I'll be out of the office today and Thursday and will call you on Friday this week when I return. Leslie is on vacation this week, and will be back on Monday.

Thanks and looking forward to chatting with you
René

René Leclerc, P.E.
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